

# **EXHIBIT 2**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re: Case No:

RESIDENTIAL CAPITAL, LLC, et. al, 12-12020(MG)

Debtors.

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DEPOSITION OF WILLIAM H. GREENE, Ph.D.

New York, New York

Thursday, January 30, 2013

10:05 a.m.

Reported by:  
JOSEPHINE H. FASSETT, RPR  
JOB NO: 28735

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(Whereupon, on the record.)

W I L L I A M H. G R E E N E, Ph.D., the  
witness, having been duly sworn, was examined  
and testified under oath as follows:

EXAMINATION BY

MR. BENTLEY:

Q Good morning, Dr. Greene. I'm Philip  
Bentley and I represent the Official Creditors  
Committee in this case.

A Good morning.

Q When were you first contacted about  
the possibility of representing the RMBS Trustees in  
this matter?

A Approximately a year ago.

Q So early 2012?

A Yes.

Q In the winter?

A I'm sorry?

Q In the winter?

A Yes.

Q Who contacted you?

A Charles Parekh.

Q Who is Mr. Parekh?

A He's -- he's at Duff & Phelps.

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Greene, Ph.D.

He's -- I don't know what title he has at Duff & Phelps, but he's one of the people there.

Q And how do you know Mr. Parekh?

A At one time he was one of my students.

Q And have you worked with him since those days?

A No.

Q What did Mr. Parekh say when he contacted you?

A He asked me if I would be interested in working on a case that involves some statistical methods and -- I guess we'll go with that.

Q He told you who the company was?

A Well, he described the case. The company names didn't have meaning to me. So he mentioned what the nature of the case was and what kinds of, what kinds of things would be involved.

Q So what did he tell you?

A Well, I can't relate the specific text of the discussion.

Q Understood.

A But he did describe how there were certain sampling issues that they needed some help with. The essential question was how to find the

1 Greene, Ph.D.

2 characteristics of a very, very large pool of  
3 mortgages when it wasn't possible to examine the  
4 whole pool. So that was the central theme of the  
5 discussion.

6 Q Was it your understanding based on  
7 this discussion that this was in connection with a  
8 settlement or a potential settlement?

9 A Yes.

10 Q Did he tell you who the settlement was  
11 potentially between?

12 A Well, again, the specific names didn't  
13 have meaning to me, so we focused on the statistical  
14 issues and questions that were going to be asked.

15 Q How long did this conversation last?

16 A Well, we had several that lasted  
17 collectively a few hours.

18 Q Over what sort of timeframe?

19 A I'd say a few weeks.

20 Q In the winter of 2012?

21 A Yes.

22 Q When did you next have any  
23 communications about this engagement?

24 A Well, it was a fairly long gap, but  
25 resumed in the fall.

1                               Greene, Ph.D.

2                               the trustees that is work product.

3                               MR. BENTLEY: Understood.

4                               And I don't mean to invade work  
5                               product, and I'll let your lawyer help us  
6                               draw the lines as we go forward.

7                               BY MR. BENTLEY:

8                               Q           First off, what was your relationship  
9                               with Duff & Phelps? You weren't an employee, were  
10                              you?

11                             A           No.

12                             Q           You're a consultant to Duff & Phelps?

13                             A           That's correct.

14                             Q           Okay. And through that relationship  
15                             you were working on the engagement with the  
16                             trustees?

17                             A           That's correct.

18                             Q           Okay. So let's start with: You've  
19                             told me about your initial discussions with  
20                             Mr. Parekh in early 2012 and your understanding  
21                             about the nature of your potential engagement at  
22                             that time. I now want to understand whether your --  
23                             to talk about whether your understanding of the  
24                             nature of that engagement evolved over time.

25                             By the time you were engaged, had you

C E R T I F I C A T E

I, JOSEPHINE H. FASSETT, a Registered  
Professional Reporter, Certified Court Reporter, and  
Notary Public within and for the State of New York,  
do hereby certify that the witness, whose deposition  
is hereinbefore set forth, was first duly sworn by  
me on the date indicated, and that the foregoing  
deposition is a true and accurate record of the  
testimony given by such witness.

I FURTHER CERTIFY that I am not employed  
by nor related to any of the parties to this action  
by blood or marriage, and that I am in no way  
interested in the outcome of this matter.

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JOSEPHINE H. FASSETT, CCR, RPR  
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